





# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

MAY 2 1 2014

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

H.C. Starck, Inc. 45 Industrial Place Newton, MA 02461

Attn: Robert Sarafian, Vice President

and General Counsel

Re: Required Submission of Information

Safety Light Corporation Superfund Site

Bloomsburg, Pennsylvania

Dear Mr. Sarafian:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Safety Light Corporation Site, which is a former manufacturing facility occupying approximately 2 acres of a 10-acre property adjacent to the Susquehanna River off Old Berwick Road, Bloomsburg, Columbia County, Pennsylvania (hereafter known as the "Site" or "Facility"). This information request addresses all periods of ownership and operation of any of Safety Light's predecessor or affiliated companies including, but not limited to, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation, Evenlite, Inc., Litebar Technology or Shield Source Incorporated. Safety Light Corporation most recently used tritium in the manufacture of self-illuminated signs. Past disposal practices at the Site have resulted in the release of radionuclides including, but not limited to, Radium 226 and tritium into on-site soils and groundwater.

Documents obtained from the Site suggests that a business arrangement existed between the Safety Light Corporation and NRC Equipment Corporation ("NRC"), which is believed to have undergone a name change to H.C. Starck, Inc. ("Starck"). Based on these documents, EPA believes that NRC may have arranged for the disposal of items containing radionuclides at the Safety Light Site. These documents, which may assist you in your research (the terms "you," "your," and "Respondent" mean H.C. Starck, Inc. or by its former name in the United States, NRC Equipment Corporation, collectively referred to herein as "Starck"), are enclosed with this letter.

Safety Light Site Required Submission of Information Page 2

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require Starck to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Facility. Please provide the specific information set forth below, under "Information Requested," for the time period 1945 to the present. EPA recognizes that this request spans a significant period of time and appreciates your cooperation.

Section 104 of CERCLA authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information follow:

#### INSTRUCTIONS

- 1. You may be entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure 1, Business Confidentiality Claims/Disclosure to EPA Contractors & Grantees of Your Response. You must clearly mark such information by either stamping or using any other form of notice that such information is trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.
- 2. Please provide a separate, detailed narrative response to each question, and to each subpart of a question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.
- 3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate by the number of the specific question(s) or subpart of the question(s) to which it responds.

- 4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
- 5. Any terms that are used in this Information Request and/or its Enclosures, which are defined in CERCLA, shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure 2, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure 2. Those terms shall have the meaning set forth in Enclosure 2 any time such terms are used in this Information Request and/or its Enclosures.

#### REQUIRED INFORMATION

For the time period 1945 to the present, please answer the following questions in accordance with the Instructions set forth above.

- 1. Describe in detail any and all business relationship(s) between NRC or Starck, and Safety Light or its affiliates (i.e., U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation, Evenlite, Inc., Litebar Technology or Shield Source Incorporated).
- 2. Did NRC or Starck ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to the Site?
- 3. Did NRC or Starck ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation, Evenlite, Inc., Litebar Technology or Shield Source Incorporated?
- 4. If you answered "yes" to Question 2 or Question 3, please provide the following information for each and every transaction:
  - a. Specify the purpose or reason for each and every transaction.
  - b. Identify the entity to which you sent radioactive materials or items containing radionuclides (i.e., Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR

Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation, Evenlite, Inc., Litebar Technology or Shield Source Incorporated);

- c. Provide a detailed description of each radioactive material or item or type of item(s) sent and the amount of radionuclides contained within each such material or item(s);
- d. Identify the method used to send or transport such radioactive materials or items to the Site (e.g., hauler, U.S. mail, etc.);
- e. Provide the date(s) of the pickup and delivery of radioactive material or item(s) containing radionuclides;
- f. Provide all documents relating to the transaction, including but not limited to invoices, and correspondence regarding the type, amount, and transportation/disposal of the radioactive material or item(s) containing radionuclides to the Site;
- g. Provide the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other persons or parties that have documentation or information pertaining to the transportation/disposal of radioactive material or item(s) containing radionuclides to the Site;
- h. If you contracted a hauler or transporter to transport and/or dispose of radioactive material or item(s) containing radionuclides to the Site, explain these arrangements and provide all documentation relating to those transactions. In addition, please identify:
  - i. the persons with whom you, or other such persons, made such arrangements;
  - ii. every date on which such arrangements took place:
  - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the persons who selected the Site as the place at which materials were disposed or treated; and
  - v. the names of employees, officers, owners, and agents for each transporter.

- i. For each and every instance in which you/your company sent, transported, or otherwise arranged transportation of radioactive material to the Site, identify:
  - i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you:
  - ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, and/or ship materials to the Site; and
  - iii. the names, titles, and areas of responsibility of any persons, including all NRC or Starck employees, present and former, who were involved in or would have knowledge of such arrangements.
- j. Provide any and all permits, applications, and correspondence between NRC or Starck, and any regulatory agencies regarding materials transported to or disposed of at the Site.
- k. Provide copies of any correspondence between NRC or Starck, and any third party regarding materials transported to or disposed of at the Site.
- 1. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
- 5. Did NRC or Starck ever generate other material(s) containing hazardous substances, not described in response to Questions 2 or 3, above, that were sent or transported to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation, Evenlite, Inc., Litebar Technology or Shield Source Incorporated, for disposal, repair or reclamation? If yes, please provide a detailed description of such other waste(s) and any and all related documentation.
- 6. For each question above, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

- 7. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.
- 8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.
- 9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:
  - a. Your document retention policy;
  - b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
  - c. A description of the type of information that would have been contained in the documents; and
  - d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.
- 10. Describe the corporate relationship between NRC and Stark (e.g., parent/child, predecessor/successor, partners, etc.,) and when this affiliation commenced.

You must respond in writing to this required submission of information within 30 calendar days of your receipt of this letter. For a corporation, the response must be signed by an appropriately authorized corporate official. For all other entities, the response must be signed by an authorized official of that entity.

If, for any reason, you do not provide all information responsive to this letter, then in your answer to EPA you must: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

Safety Light Site Required Submission of Information Page 7

All documents and information should be sent to:

Harry R. Steinmetz (3HS62) U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this request for information please contact Harry Steinmetz at (215) 814-3161. Legal questions can be referred to Humane Zia at (215) 814-3454.

Sincerely,

oanne L. Marinelli

Chief, Cost Recovery Branch

cc: Humane Zia, Esq. (EPA)

Mitch Cron (EPA)

Jeff Whitehead (PADEP)

John Angevine (PADEP)

**Enclosures:** 

Enclosure 1: Business Confidentiality Claims/Disclosure of

Your Response to EPA Contractors and Grantees

Enclosure 2: Definitions

Enclosure 3: List of Contractors That May Review Your Response

Enclosure 4: United States Radium Corporation Documents

#### Enclosure 1

#### Business Confidentiality Claims, Disclosure of Your Response to EPA Contractors and Grantees

You are entitled to assert a claim of business confidentiality covering all or any part of the submitted information, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted at the time the required information is submitted to EPA, EPA may make this information available to the public without further notice to Safety Light or its Affiliates.

EPA may contract with one or more independent contracting firms (see attached list of EPA contractors and cooperative agreement grantees) to review the documentation, including documents which you claim are confidential business information ("CBI"), which it submits in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for agency personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. § 9604(e)(7), and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed. Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which it claims are CBI to any or all of the entities listed in the attachment, you must notify EPA in writing at the time you submits such documents.

#### **Enclosure 2**

#### **Definitions**

- 1. The term "<u>arrangement</u>" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.
- 2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts. correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, interoffice and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.
- 3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 [of the U.S. Code], (b) any element, compound, mixture. solution, or substance designated pursuant to section 9602 of [CERCLA], (c) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (42 U.S.C. Section 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.) has been suspended by Act of Congress), (d) any toxic pollutant listed under section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. Section 7412), and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 2606 of Title 15 [of the U.S. Code]. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph. and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- 4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any

#### List of Contractors That May Review Your Response

Emergint Technologies, Inc.

Contract # EP-W-11-025

Subcontractor: Booz-Allen & Hamilton

Booz-Allen & Hamilton

Contract # EP-W-11-016

**CDM-Federal Programs Corporation** 

Contract # EP-S3-07-06

Subcontractors: CDI-Infrastructure, LLC d/b/a L.R.

Kimball

Avatar Environmental LLC

**Terradon Corporation** 

Chenega Global Services, LLC

Contract #EP-S3-09-02

EA Engineering, Science and Technology, Inc.

Contract #EP-S3-07-07

Subcontractor: URS

Eisenstein Malanchuck, LLP

Contract #EP-W-13-006

Subcontractors: R. M. Fields International, LLC

James C. Hermann & Associated

Hydrogeologic (HGL)

Contract #EP-S3-07-05

Subcontractor: CH2MHill

Sullivan International

**Weston Solutions** 

Contract #EP-S3-1005

Tech Law, Inc.

Contract #EP-S3-1004

Tetra Tech NUS, Inc.

Contract #EP-S3-07-04

Kemron Environmental Services, Inc.

Contract #EP-S3-12-01.

Subcontractor: AECOM Technical Services, Inc.

Guardian Environmental Services Company, Inc.

Contract #EP-S3-12-02,

Subcontractors: Aerotek, Inc.,

Tetra Tech, Inc.

Environmental Restoration, LLC

Contract # EP-S3-12-03

Subcontractors: Aerotek, Inc.

Haas Environmental, Inc.

Hertz

WRS Infrastructure & Environment, Inc.

Contract # EP-S3-12-05

**ICF** International

Contract # EP-BPA-12-W-0003

Cooperative Agreements

National Association of Hispanic Elderly

CA# CQ-835398

National Older Workers Career Center

CA# Q-835030

### Enclosure 4

PLANT: BLOOMSBURG, PA. 717-784-3810 TWX-USRC-BLBG-717-784-3447

#### UNITED STATES RADIUM CORPORATION MORRISTOWN, NEW JERSEY

Nº

4693

SOLD TO

NRC Equipment Corporation 160 Charlement Street Newton, Massachusetts

1-24-66 service part

BE 064685

SHIPPED YIA

CUSTOMER ORDER			CUSTOMERNUMSER		NET 30 D	AYS				
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### UNITED STATES RADIUM CORPORATION

MORRISTOWN, NEW JERSEY SOLB NRC Equipment Corporation 160 Charlemont Street Newton, Massachusetts 1-24-66 BL 064685 SHIP TERMS: NET 30 DAYS ---S.E. MADRIAN ACK NO. DESCRIPTION OF MAYERIAL AMOUNT lot radium foil for scrap disposal-30.00/ lot disposal Delivery: for billing purposes obly. SHIPMENTS THEM P.S. NO. MANUSCE NO. 5. PLANT MANAGER ORDER COPY

SL000564

## BL 064685 JAN24

MEMO SALES ORDER

January 24, 1966

Attention: Dave Derr :: S

Please enter following order NRC Equipment Corporation
160 Charlemont Street
Newton, Mass.

Purchase Order No. - Messo TMT

One lot radium foil for scrap disposal. Disposal

charge \$30.00 per lot.

Material received at Bloomsburg approx 1/17. Scrapping to be
performed immediately.

LAB CIV 17

T. W. Taylor/rel

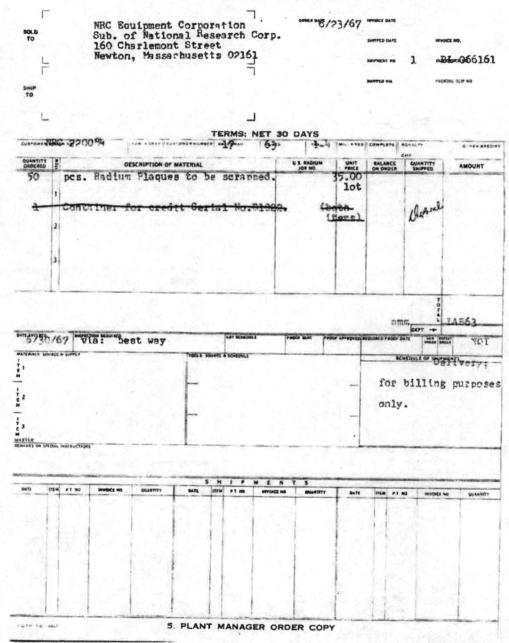
Job 60 Entres 1/25 For Billing One

Busy

CREDIT APPROVED

PLANT: BLOOMSBURM, PA. 717-784-3810 TWX-USRC-BLEG-717-784-2447 UNITED STATES RADIUM CORPORATION MORRISTOWN, NEW JERSEY Nº 21226 NRC Equipment Corporation Sub. of National Research Corp. SOLD TO 160 Charlemont Street 21226 Newton, Massachusetts 02161 ous 0000 NO 056161 NONE SHIP TO TERMS: NET 30 DAYS POS-X DEST | CHETOMER MUMBER | BALE 19 CUSTOMER ORDER 30.220054 MIL-XYES CONFLETE ROYALTY-OTHER SPECIFY XII CHE QUANTITY U.S. RADIUM BALANCE DESCRIPTION OF MATERIAL QUANTITY AMOUNT pcs. Radium Plaques to be scrapped. 35.00 35,00 50 lol EXEMPT COMMISSION DOLLARS #1 #2 #3 E. ACCOUNTING INVOICE COPY amm THIS IS TO CERTIFY I HAT THE MERCHANDISE LISTED IN THIS INVOICE HAS BEEN PRODUCED IN ACCORDANCE WITH THE FAIR LABOR STANDARDS ACT OF 1910 AS AMENDED. FORM NO. 38-15 DEPT. NO. + 5/30/69 200. SL000566

## UNITED STATES RADIUM CORPORATION MORRISTOWN, NEW 1ERSEY



SL000567

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QUANTITY	DESCRIPTION	STOCK - B/M N	D. HEM	CHARGE UNIT P	RICE TOTAL PRICE
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UNITED STATES RADIUE CORPORATION NTI SLOOMSBURG, PA. 717-784-3810 TWX-USRC-9LBG-717-784-2447 MORRISTOWN, NEW JERSEY 13779 NRC Equipment Corporation 160 Charlemont Street 20-6-66 SOLD Newton, Massachusetts 02161 TO TERMS: NET 30 DAYS POS-X DEST CUSTOMER NUMBER SUCCESSION 旅亡 213932 ---QUANTITY ORDERED U.S. RADIUM JOB NO. BALANCE ON DRDER DESCRIPTION OF MATERIAL Plaque Radium to destroy-credit 40 requested for container 3239 35.00 lot

E. ACCOUNTING INVOICE COPY

EXEMPT COMMISSION

FORM NO. 38-15

TIME IS TO-CERTUFY THAT THE RESCHARGES LISTED IN THIS IDVOICE HAS BEEN PRODUCED IN ACCORDANCE WITH THE PASP LABOR STANDARDS ACT OF 539F AS AMERICA

#2

DOLLARS | #1

SITTINI DEPT. NO. >

TAB 63

SL000569

## UNITED STATES-RAPIUM CORPORATION MORRISTOWN, NEW JERSEY

